

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

Effectively Illuminated Pathways LLC,

Plaintiff,

v.

**Aston Martin Lagonda of North America,
Inc.;**
Bentley Motors, Inc.;
BMW of North America, LLC;
Ford Motor Company;
Maserati North America, Inc.;
Mitsubishi Motors North America, Inc.; and
Volkswagen Group of America, Inc.,

Defendants.

Civil Action No. _____

JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Effectively Illuminated Pathways LLC (“EIP”) alleges as follows:

PARTIES

1. EIP is a Texas limited liability company having a principal place of business at 2500 Dallas Parkway, Suite 260, Plano, Texas 75093.

2. On information and belief, Aston Martin Lagonda of North America, Inc. is a Connecticut corporation with a principal place of business at 9920 Irvine Center Drive, Irvine, California 92618.

3. On information and belief, Bentley Motors, Inc. is a Delaware corporation with a principal place of business at 3 Copley Place, Suite 3701, Boston, Massachusetts 02116.

4. On information and belief, BMW of North America, LLC is a Delaware limited liability company with a principal place of business at 300 Chestnut Ridge Road, Woodcliff Lake, New Jersey 07677.

5. On information and belief, Ford Motor Company is a Delaware corporation with a principal place of business at One American Road, Dearborn, Michigan 48126.

6. On information and belief, Maserati North America, Inc. is a Delaware corporation with a principal place of business at 250 Sylvan Avenue, Englewood Cliffs, New Jersey 07632.

7. On information and belief, Mitsubishi Motors North America, Inc. is a California corporation with a principal place of business at 6400 Katella Avenue, Cypress, California 90630.

8. On information and belief, Volkswagen Group of America, Inc. is a New Jersey corporation with a principal place of business at 2200 Ferdinand Porsche Drive, Herndon, Virginia 20171.

JURISDICTION AND VENUE

9. This action arises under the patent laws of the United States, Title 35 of the United States Code. This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a).

10. Venue is proper in this district under 28 U.S.C. §§ 1391(b)-(d) and 1400(b). On information and belief, each defendant is subject to personal jurisdiction in this district, has committed acts of patent infringement in this district, or has a regular and established place of business in this district.

11. On information and belief, each defendant is subject to this Court's specific and/or general personal jurisdiction pursuant to due process or the Texas Long Arm Statute, due at least to its substantial business in this forum, including: (i) at least a portion of the infringements alleged herein; or (ii) regularly doing or soliciting business, engaging in other persistent courses of conduct, or deriving substantial revenue from goods and services provided to individuals in Texas and in this district.

COUNT I

INFRINGEMENT OF U.S. PATENT NO. 6,520,669

12. EIP is the owner by assignment of United States Patent No. 6,520,669 ("the '669 patent"), entitled "Flexible Substrate Mounted Solid-State Light Sources for Exterior Vehicular Lighting." The '669 patent issued on February 18, 2003. A true and correct copy of the '669 patent is attached as Exhibit A.

13. On information and belief, each defendant has infringed and still is infringing one or more claims of '669 patent by making, using, selling, offering to sell, or importing automotive exterior LED lights.

14. As a result of each defendant's infringement of the '669 patent, EIP has suffered monetary damages in an amount not yet determined, and will continue to suffer damages in the future unless each defendant's infringing activities are enjoined by this Court.

15. Unless a permanent injunction is issued enjoining each defendant and its agents, servants, employees, attorneys, representatives, affiliates, and all others acting on its behalf from infringing the '669 patent, EIP will suffer irreparable harm.

PRAYER FOR RELIEF

WHEREFORE, EIP respectfully requests that this Court enter:

- A. A judgment that each defendant has infringed the '669 patent;
- B. A permanent injunction enjoining each defendant and its officers, directors, agents, servants, affiliates, employees, divisions, branches, subsidiaries, parents, and all others acting in concert or privity with it from infringing the '669 patent;
- C. An accounting for damages arising from the infringement of the '669 patent by each defendant and all those in privity with it;
- D. An award of damages proximately caused by each defendant's acts of infringement, at least under 35 U.S.C. § 284;
- E. A judgment and order finding that this is an exceptional case within the meaning of 35 U.S.C. § 285 and awarding to EIP its reasonable attorneys' fees against each defendant;
- F. An award of pre-judgment and post-judgment interest against each defendant; and
- G. Any and all other relief to which EIP may show itself to be entitled.

DEMAND FOR JURY TRIAL

EIP demands a trial by jury on all issues so triable.

Respectfully submitted,

Dated: January 18, 2011

By: /s/ Andrew W. Spangler
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